

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LABORERS INTERNATIONAL UNION OF : CIVIL ACTION
NORTH AMERICA, LOCAL NO. 199/847 :
WELFARE, PENSION, EDUCATION, and : NO. 02-CV-2871 (CW)
ANNUITY FUNDS, et al., :
Plaintiffs :
 :
 :
v. :
 :
 :
DAN LEPORE & SONS, INC. :
Defendant. :

PLAINTIFFS' MOTION FOR ENTRY OF DEFAULT JUDGMENT

AND NOW COME the Plaintiffs, by and through their attorneys, Markowitz and Richman, and moves this Court to enter default judgment in their favor. In support thereof, the Plaintiffs rely upon the Complaint, the Affidavit of Jonathan Walters and their Statement of Damages.

WHEREFORE, the Plaintiffs move this Honorable Court to enter judgment on their behalf in the amount of \$1,188.15 and Order that the defendant make future contributions in a timely manner and in accordance with the applicable collective bargaining agreement and the rules of the Agreements and Declarations of Trusts establishing the plaintiff benefit funds.

Respectfully submitted,

BY: _____
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